



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #16  
Cleanup Resumes/Progress  
Pilsen Soil Operable Unit 2 Residential  
C5N8RV02  
Chicago, IL

**To:** Bruce Everetts, Illinois EPA  
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**From:** Ramon Mendoza, On-Scene Coordinator

**Date:** 5/8/2018

**Reporting Period:** 4/16/18 to 5/7/2018

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5N8RV02	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/3/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	2
<b>Mobilization Date:</b>	12/19/2016	<b>Start Date:</b>	12/20/2016
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	ILN000504472	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

This time critical removal action is a PRP lead under an EPA Unilateral Administrative Order.

#### 1.1.2 Site Description

Pilsen Soil Operable Unit 2 (OU2) Residential Site : Operable Unit (OU) 2 is a residential area bounded by West 18th Place to the north, a north-south alley between South Allport Street and South Racine Avenue to the east, West 21st Street to the south, and South Loomis Street to the west. There are about 178 residential properties in this 25-acre OU2 site. About 116 of the properties have non-permanent covers in their yards such as bare soil, grass or gravel and are the focus of EPA actions. In 2010, approximately 1,563 people lived within the boundaries of the Site, and the residential yards have high accessibility to sensitive populations including young children and pregnant women.

##### 1.1.2.1 Location Chicago, Illinois 60608

See Site Description

##### 1.1.2.2 Description of Threat

The lead concentration in surfaces soils are above the EPA screening level of 400 mg/kg lead in residential yards and gardens. Residents living in these homes may be exposed to the lead in these surface soils.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted Site Assessment activities in 2013 to 2015 with additional residential parcels sampled in 2016. Additional residential parcels have also been sampled in 2017 to 2018. Lead was found in surface soils in the residential yards and gardens above the EPA removal management level of 400 parts per million. The average Site surface soil lead concentrations were 1,412 mg/kg. There is an estimated population of around 1,563 people including children living, walking, working, and playing on the contaminated surface soils in the Site. These people have a high accessibility to residential yards including sensitive populations such as young children and pregnant women. EPA's risk assessment concluded that the soil concentrations of lead at the Site are at an unacceptable risk level to the residents accessing the Site.

## 2. Current Activities

## 2.1 Operations Section

### 2.1.1 Narrative

Initial residential soil cleanup work was conducted from, Dec. 20 - 23, 2016. After taking a break during the winter season, residential yard cleanup was restarted on April 24, 2017 and continued through December 22, 2017. After another break during the winter season, residential yard cleanup was restarted again this year on April 17, 2018. EPA OSC and START provided part time oversight of removal activities on site, collected soil samples as needed, and conducted XRF analysis as needed. GHD (H.Kramer's contractor) had representatives on-site to oversee the removal work. Removal work was also conducted by GHD's contractor RW Collins. START or EPA OSC documented property specific removal activities by recording field notes and by taking photographs. Air monitoring as required by OSHA was conducted by GHD.

### 2.1.2 Response Actions to Date:

**H. Kramer contractors conducted response actions on Dec. 2016 and April - Dec. 2017. During this period H. Kramer conducted response actions in 54 residences. During this period, several owners provided consent for access for sampling and cleanup of their homes. Response actions for the aforementioned 54 homes are documented in previous pollution reports: POLREPs 1 to 15.**

Work was conducted after H. Kramer's contractor (GHD) contacted the owners and agreed on a scope of work in writing. Below is a removal status summary of each of the properties. All properties were 3-4 ft. below the street level with limited access, which made excavation work more difficult and time consuming. GHD conducted project management, particulate air monitoring during excavation and backfill activities at the residential and soil staging areas. RW Collins contractor/laborers conducted the physical work of excavation and backfilling of soil and also managed the soil at the H. Kramer property staging area.

In general, unless noted for each home, lead contaminated soil was excavated by hand with shovels and fed into a vacuum hose to the vacuum truck. Yards were excavated down to 1 ft and gardens down to 2 ft below the surface. After it was filled the truck was driven to the soil staging area at H. Kramer's truck yard and the soil was transferred to steel containers, which are then transported for disposal to a solid waste landfill (Waste Management, Laraway) in Joliet IL. For backfilling, clean soil was transferred from the flatbed truck to the yard by conveyor belts, shovels and wheelbarrows to backfill. An orange fence marker was placed at the bottom of the excavation before backfilling. Final surface cover could be gravel, soil, or sod (new grass), depending on the owner preference.

Air monitoring at the homes and staging area did not show violations of the OSHA PEL criteria during this reporting period. Workers wore level D with rubber booties and gloves during excavation of lead contaminated. GHD provided a boot wash to protect workers and minimize soil migration outside of the work area.

EPA OSC met (4/12/2018) with the Chief of Staff for Alderman Solis to let them know cleanup was restarting again at the Site. EPA was briefed on most recent gang activity for the purpose of keeping cleanup crews safe. Information was passed on to H. Kramer's contractors (GHD and RW Collins).

**The following response actions were conducted by H. Kramer contractors from April 16 to May 7, 2018. During this period, response actions were taken at the the following homes:**

**Home at Non-Responsive - 4/17 to 4/20/2018** - H. Kramer contractors conducted removal work in the backyard garden areas at this home. The north and east backyard gardens were excavated down to 2 feet, backfilled with clean soil, and restored with mulch. The west garden strip was filled with young trees, so soil in this area as scrapped about three inches, backfilled with clean soil, and restored with mulch.

**Home at Non-Responsive - 4/23 to 4/25/2018** - H Kramer contractors conducted removal work in the backyard. Crews encountered a uniform concrete barrier in the west yard area at 9-10 inches, the west yard area was therefore excavated to the depth of the concrete barrier. This area was backfilled with clean soil and restored with sod. The east garden area was also excavated. Crews encountered a uniform concrete barrier in the garden area excavation on the north side at 6-8 inches. The concrete barrier covered 3/4 of the garden area, this area was excavated to the depth of the concrete barrier. Crews excavated to 2 ft in the remaining 1/4 portion of the garden. The garden area was backfilled with clean soil following excavation. The soil area under the stairs was scraped down 6 inches and backfilled with gravel.

**Home at Non-Responsive - 4/25 to 5/7/2018** - The backyard at this home was excavated to 1 ft. A significant amount of old construction debris such as brick and broken concrete was discovered by crews during the excavation work. Crews transferred construction debris by bucket to a plastic lined truck bed. The backyard excavation was backfilled with clean soil and restored with sod. The backyard garden was excavated to 2 ft, backfilled with clean soil, and restored with mulch. Work was delayed due to the vac truck breaking down on 4/26. Crews completed the remainder of excavation work by transferring excavated soil by bucket to a plastic lined truck bed. Removal and restoration work in the backyard work was completed on 5/1/2018. Crews began excavation in the front yard on 5/4/2018. The vac truck was still broken down so crews conducted excavation work with buckets. Excavation work in the front yard was completed on 5/7/2018, the front yard garden to the west was excavated to 2 ft and the front yard soil area was excavated to 1 ft. As of 5/7/2018, crews completed backfilling in the front yard. The front yard garden was backfilled with clean soil and restored with mulch. The front yard soil area excavation was backfilled with gravel.

**Home at Non-Responsive - 5/1 to 5/2/2018** - At the request of the owner in 2017, crews only placed a thin layer of gravel in the backyard following removal work. The owner then placed a thin layer of mulch over the gravel. At the request of the owner in 2018, crews completed backfill of the backyard area. The owner was informed and approved of backfilling with clean soil over the thin gravel and mulch layers. Crews backfilled the backyard with clean soil and restored the backyard with sod.

**Home at Non-Responsive - 5/3 to 5/4/2018** - At the request of the owner, crews returned to conduct additional backfill and restoration work. Work was originally completed at this property in Dec. 2017. Crews backfilled the front yard grass area, backyard soil area, front yard garden with additional clean soil. Crews restored the front yard grass area and backyard soil area with sod. At the request of the owner, crews placed gravel over the clean backfill soil in the side yard.

**Additional sampling was conducted at 6 residential homes during this reporting period. A total of 5 of the 6 residential homes had lead concentrations in soil above the screening level of 400 mg/kg and require clean up. Sampling was conducted on the following dates at the following homes:**

**Home Non-Responsive** Sampled on 4/23/2018. A total of two soil samples were collected from

eastern open grass lot, one to the north and one to the south. The samples from the open grass lot were collected as 5 pt composite 0-6 inches. One soil sample was collected from the backyard north of the home as a 4 pt composite 0-6 inches. The garden on the east side of the eastern open lot was sampled as a 2 pt composite 0-12 inches. Preliminary sample results indicate all areas contain lead concentrations in the soil above the screening level of 400 mg/kg and require clean up.

**Home** **Non-Responsive** [REDACTED] Sampled on 4/23/2018. One soil sample was collected from the east side yard soil strip as a 3 pt composite 0-6 inches. The preliminary sample result indicates lead concentrations in the soil above the screening level of 400 mg/kg and requires clean up.

**Home** **Non-Responsive** [REDACTED] Sampled on 4/23/2018. One sample was collected from the backyard soil area as a 5 pt composite 0-6 inches. The preliminary sample result indicates lead concentrations in the soil above the screening level of 400 mg/kg and requires clean up.

**Home** **Non-Responsive** [REDACTED] Sampled on 4/23/2018. One soil sample was collected from the backyard garden as a 3 pt composite 0-12 inches. One soil sample was collected from the southern side yard soil strip as a 5pt composite 0-6 inches. Preliminary sample results indicate all areas do not contain lead above the screening level of 400 mg/kg and therefore do not require clean up.

**Home** **Non-Responsive** [REDACTED] Sampled on 4/24/2018. One soil sample was collected from the backyard garden as a 2 pt composite 0-12 inches. One soil sample was collected from the side yard to the east of the south side of the property as a 5pt composite 0-6 inches. The side yard had a wooden walkway overhead but the majority of the side yard had overhead clearance of 6ft or more. Preliminary sample results indicate all areas contain lead concentrations in the soil above the screening level of 400 mg/kg and require clean up.

**Home** **Non-Responsive** [REDACTED] Front yard of the property sampled on 5/01/2018. One soil sample was collected from the front yard garden as a 3 pt composite 0-12 inches. The northern point was 0-6 inches due to a concrete barrier. One soil sample was collected from the front yard soil area as a 2pt composite 0-6 inches. The front yard soil area was a mixture of soil and gravel. Preliminary sample results indicate all areas contain lead concentrations in the soil above the screening level of 400 mg/kg and require clean up.

**Media Interest:** There was no media interest during the reporting period.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

During EPA's Removal Site Evaluation (2013-14), H. Kramer & Co. was identified as a significant contributor to the lead found in surface soils in the residential parcels at the Site, due to historical fugitive air emissions of dust which contained lead (slag and zinc oxide). The response work is being overseen by EPA/START contractor and is being conducted by H. Kramer's contractors under a Unilateral Administrative Order (UAO) issued by the USEPA (Sept. 2016). Previous sampling work was conducted from April to June 2016 by H. Kramer's contractors at the Site under an EPA (CERCLA Administrative Order on Consent; to determine the amount of homes above the lead screening level of 400 mg/kg which needed to be cleaned up.

### 2.1.4 Progress Metrics :

As of May 7, 2018, 57 residential parcels have undergone cleanup and completed or have been removed from the cleanup list.

During the reporting period as of May 8, 2018, 68.96 tons of lead contaminated soil was disposed. H Kramer's contractors have disposed of 863.03 tons of non-hazardous lead contaminated soil to the solid waste landfill facility in Joliet, IL.; since excavations of parcels were initiated in Dec. 2016.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity (in tons)</i>	<i>Manifest/Ticket#</i>	<i>Treatment</i>	<i>Ship Date</i>	<i>Disposal Facility</i>
Soil		10.16	851385		12/22/2016	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.42	889972		4/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.98	890592		4/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.39	891212		4/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		7.95	894904		5/8/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.98	896484		5/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.78	898993		5/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.71	900453		5/18/2017	Laraway RDF, Waste Management, Joliet, IL.
						Laraway RDF,

Soil		11.89	900819		5/19/2017	Waste Management, Joliet, IL.
Soil		10.49	901772		5/23/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.92	902005		5/23/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.66	902633		5/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.65	904544		5/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.78	904744		5/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.69	915148		6/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.51	912918		6/20/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.71	923037		7/17/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.29	923543		7/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.56	925351		7/21/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.33	925625		7/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.62	926172		7/25/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.09	926615		7/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.76	927883		7/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.66	933810		8/14/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.47	935594		8/17/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.76	941816		8/29/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.33	940041		9/1/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.09	941952		9/5/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.16	945518		9/6/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.14	945956		9/12/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.12	946578		9/13/2017	Laraway RDF, Waste Management, Joliet, IL.

Soil		11.39	94880		9/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.12	959184		9/20/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.69	951525		9/22/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.51	953264		9/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.95	961224		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		18.71	961440		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		18.48	961668		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.39	963390		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.12	963391		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.15	963537		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		17.77	963538		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		19.9	963853		10/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.5	966082		10/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.19	967586		10/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.98	968461		10/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.1	969072		10/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.89	970192		10/30/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.73	970505		10/30/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.37	970785		10/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.82	976978		11/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.11	980304		11/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.19	985773		11/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.7	985773		11/28/2017	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		13.19	985957		11/29/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.94	988543		12/4/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.23	990500		12/6/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.16	992436		12/8/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.74	996636		12/15/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.84	1032003		4/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.79	1033160		4/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.2	1034605		4/24/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.8	1035962		4/26/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.33	1037089		4/30/2018	Laraway RDF, Waste Management, Joliet, IL.
<b>Total</b>		<b>863.03</b>				

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Cleanup is Ongoing, soil is being excavated and replaced with clean soil and sod or gravel depending on the owner preference.

#### 2.2.1.2 Next Steps:

GHD and EPA are working together to contact homeowners who have given consent but are not available to meet to provide input on the excavation schedule and scope of work. EPA and START contractor will continue to oversee the work to ensure compliance with the EPA Order.

### 2.2.2 Issues :

Some homeowners who gave permission for cleanup, are difficult to contact so the work can be schedule. EPA is working with GHD to solve this problem.

## 2.3 Logistics Section

Work this period was supported by a 4 laborer(includes one operator0, forman, technical engineer, EPA START contractor and EPA OSC.

Equipment includes one pickup truck, one dump truck, one skid steer, two 20 yard containers, one soil vac truck , three 10 fot conveyou belts, and hand dig tools.

## 2.4 Finance Section

### 2.4.1 Narrative

The START total budget ceiling is currently \$120,000. Of this amount a total of \$92,948.89 (as of May 4, 2018) has been spent overseeing the responsible party contractor removal activities, overseeing responsible party contractor sampling activities, and collecting/analyzing soil samples under the EPA Administrative Order on Consent. Additional funds were utilized for technical support for the Unilateral Administrative Order for the Site. This additional budget is estimated to fund START's continued oversight work and cleanup support through June 2018.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
TAT/START	\$120,000.00	\$92,948.89	\$27,051.11	22.54%
Intramural Costs				
<b>Total Site Costs</b>	\$120,000.00	\$92,948.89	\$27,051.11	22.54%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Ramon Mendoza, EPA OSC;  
Walt Pochron, Ivan Navarro; GHD (H. Kramer contractor)

### 2.5.2 Liaison Officer

EPA Community Relations: Heriberto Leon

### 2.5.3 Information Officer

EPA PIO: Francisco Arcaute, Rachel Bassler

## 3. Participating Entities

### 3.1 Unified Command

None

### 3.2 Cooperating Agencies

City of Chicago, Alderman Solis Office  
City of Chicago Dept. of Public Health;  
Illinois EPA  
ATSDR

## 4. Personnel On Site

Pilsen OU2 Removal – Personnel Counts Notes: START is EPA's oversight contractor GHD and RW Collins are H. Kramer Contractors.					
Date	EPA	GHD	RW Collins	EPA/START	
11/20 to 12/22/2017	1 OSC Visit the site 3 to 4 days /week oversight	1	5	1 (present onsite on as needed basis at this time.)	

Note: All personnel have temporarily demobilized from the Site for the Winter.

## 5. Definition of Terms

N/A

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

<https://www.epa.gov/il/pilsen-area-soil-site>

### 6.2 Reporting Schedule

**POLREPS will be issued every two weeks as appropriate.**

## 7. Situational Reference Materials

See link for the Site at: <https://www.epa.gov/il/pilsen-area-soil-site>





